

**UNITED STATES DISTRICT COURT**  
 for the  
**Eastern District of Michigan**

United States of America

v.

Christina Anasi

Case: 2:23-mj-30217

Assigned To : Unassigned

Assign. Date : 5/26/2023

CMP: SEALED MATTER (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April-December 2020 in the county of Macomb in the  
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	Conspiracy to Commit an Offense Against the United States.
18 U.S.C. §§ 1343,1344	Wire Fraud, Bank Fraud.
18 U.S.C. § 1349	Conspiracy to Commit Wire Fraud and Bank Fraud.
18 U.S.C. § 1957	Money Laundering.
18 U.S.C. §§ 1028A, 1014	Aggravated Identity Theft; False Statements

This criminal complaint is based on these facts:

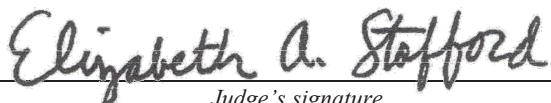
Continued on the attached sheet.



Complainant's signature

Brent Nida, Special Agent, FBI

Printed name and title



Judge's signature

Hon. Elizabeth A. Stafford, United States Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence  
 and/or by reliable electronic means.

Date: May 26, 2023

City and state: Detroit, MI

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Brent Nida, Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, state that:

**INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of a criminal complaint and arrest warrant for CHRISTINA ANASI.

2. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code.

3. I have been employed by the FBI as a Special Agent since January 2018. During my employment with the FBI, I have investigated federal crimes including mail fraud, wire fraud, tax fraud, and various other criminal matters. Prior to being employed by the FBI, I was a Police Officer for approximately nine years. At all times during the investigation described in this affidavit, I have been acting in an official capacity as a Special Agent of the FBI.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, from contractors, and from witnesses. This affidavit is intended to show only that there

is sufficient probable cause for to secure a criminal complaint and arrest warrant for CHRISTINA ANASI and it does not set forth all of my knowledge about this matter.

5. In light of the facts described below, as well as my training and experience, I submit that there is probable cause to believe that CHRISTINA ANASI has committed federal crimes, including, but not limited to, violations of the following statutes: 18 U.S.C. § 371 (Conspiracy to Commit an Offense Against the United States); 18 U.S.C. § 1343 (Wire Fraud), 18 U.S.C. §1344 (Bank Fraud); 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud and Bank Fraud); 18 U.S.C. § 1957 (Money Laundering), 18 U.S.C. § 1028A (Aggravated Identity Theft) and 18 U.S.C. § 1014 (False Statements in Connection with a Bank Loan).

#### **BACKGROUND OF THE PAYCHECK PROTECTION PROGRAM**

6. The Coronavirus Aid, Relief, and Economic Security (CARES) Act is a federal law enacted in or around March 2020 and designed to provide emergency financial assistance to the millions of Americans who are suffering the economic effects caused by the COVID-19 pandemic. One source of relief provided by the CARES Act was the authorization of up to \$349 billion in forgivable loans to businesses for job retention and certain other expenses, through a program referred to as the Paycheck Protection Program (PPP). In or around April 2020, Congress authorized over \$300 billion in additional PPP funding.

7. In order to obtain a PPP loan, a qualifying business was required to submit a PPP loan application, which was to be signed by an authorized representative of the business. The PPP loan application required the business (through its authorized representative) to acknowledge the program rules and make certain affirmative certifications in order to be eligible to obtain the PPP loan. In the PPP loan application, the business (through its authorized representative) was required to state, among other things, its average monthly payroll expenses and number of employees. These figures were used to calculate the amount of money the business was eligible to receive under the PPP. In addition, businesses applying for a PPP loan often provided documentation supporting their purported payroll expenses.

8. A PPP loan application was processed by a participating lender. If a PPP loan application was approved, the participating lender funded the PPP loan using its own monies, which were generally guaranteed by the Small Business Administration (SBA). Data from the application, including information about the borrower, the total amount of the loan, and the listed number of employees, was transmitted by the lender to the SBA in the course of processing the loan.

9. PPP loan proceeds were required to only be used by the business on certain permissible expenses—generally payroll costs, interest on mortgages, rent, utilities and other explained business expenses. The PPP allowed the interest and

principal on the PPP loan to be entirely forgiven if the business spent the loan proceeds on these expense items within a designated period of time after receiving the proceeds and used a certain amount of the PPP loan proceeds on payroll expenses.

**PROBABLE CAUSE**

**Summary of Investigation**

10. In or around August 2020, a representative of Fundbox, Inc. informed law enforcement of suspected fraudulent PPP loan applications submitted for Different Flavors 14355, INC. (“FLAVORS”), JD Hydro, LLC., Detroit Prime Liquor, LLC, Andrew Shallal, INC., and AAB Restaurant, INC. A total of nine PPP loan applications were submitted to Fundbox using internet protocol (IP) address 96.85.123.41. An IP address is a unique string of characters that identifies each computer using the Internet Protocol to communicate over a network.

11. Since nine applications were submitted from the same IP address, they were likely completed using the same computer and/or internet connection. The IP address is assigned to Comcast and records were requested regarding the IP Address. Comcast identified the account assigned the IP address as a doctor’s office located in Clinton Township, Michigan (“Doctor’s Office”). Eight of the nine PPP loan applications using the IP address were rejected. Fundbox rejected the loans due to suspected fraud. The JD Hydro loan application was accepted and the loan was

funded. Records for all nine applications have been reviewed by Affiant and all were fraudulent attempts to receive PPP loans.

12. A PPP loan was later provided for FLAVORS which will be described in further detail later in this affidavit. The PPP funds for FLAVORS were deposited into an account titled C&S Liquor (CS), with SK and CHRISTINA ANASI (“ANASI”) as signers on the account. SAMER KAMMO (“SAMER”) is SK’s son and ANASI’s husband.

13. The Small Business Administration provided records showing SAMER received a \$557,807 PPP loan through Harvest Small Business Finance, LLC. (Harvest), for Wireless Plus Cellular (WPC). Records show SK received PPP a \$75,500 PPP loan through CRF Small Business Loan Company for CS and a \$564,032 PPP loan for D&H Market Inc. (DH) through Celtic Bank.

14. On November 27, 2020, your affiant executed a seizure warrant issued by this court and seized \$498,027.99 of remaining funds from the WPC PPP loan and \$205,898.76 of remaining funds from the FLAVORS PPP loan.

15. On December 3, 2020, at approximately 9:45 AM, affiant conducted surveillance at the Doctor’s Office. A black Cadillac CTS bearing a Michigan Registration ending in 3303 was parked in front of the business. That same CTS was also observed at the business on December 5, 2020, at approximately 1:00 PM; December 9, 2020, at approximately 9:19 AM; and, December 9, 2020, from

approximately 2:30 PM through 9:00 PM. The CTS is registered to RITA SHABA (“SHABA”).

16. The Small Business Administration provided documents identifying three PPP loans issued to SHABA: \$240,000 for Green Gold Rush, LLC., through Cross River Bank; \$561,450 for Queen of the Green, LLC., through Harvest; and, \$90,074 for Forever Beauty, LLC. through Celtic Bank. The investigation has determined that all of these loans were approved based on fraudulent representations.

17. On December 22, 2020, your affiant executed a seizure warrant issued by this court and seized \$50,247.23 of remaining funds from the Forever Beauty PPP loan and \$845,617.05 of remaining funds from the Queen of the Green and Green Gold Rush PPP loans. Search warrants issued by this court were also executed at the Doctor’s Office and SHABA’s residence on that date.

18. The FBI and Homeland Security Investigations (HSI) are investigating fraud involving the PPP loan applications submitted by FLAVORS, WPC, CS, DH and the other related entities. The investigation has identified over \$3,300,000 in fraudulent disbursed PPP loans associated with ANASI, SHABA, and SAMER. The group also attempted to obtain at least an additional \$8,700,000 in fraudulent COVID relief loans that were not funded due to suspected fraud or applications withdrawn.

**D&H Market (DH) PPP loan**

19. The SBA provided documentation for a PPP loan issued to D&H MARKET, INC (DH). SBA loan 52222474-08 was issued to DH by Celtic Bank Corporation (Celtic) in the amount of \$564,032 on or about May 12, 2020. The business address listed on the loan application is 2134 Martin Luther King, Flint, Michigan. The loan was approved on May 12, 2020. In SBA loan records, DH is listed as a meat market with 28 employees established on March 1, 1993. SK is listed as DH's authorized representative for the loan.

20. Headquartered in Salt Lake City, Utah, Celtic is a privately owned industrial bank chartered by the State of Utah. Celtic specializes in small business finance, helping business owners with working capital, expansion, acquisition, construction, equipment financing, real estate, and more.

21. Celtic was subpoenaed for records regarding the DH PPP loan. Celtic provided an SBA Paycheck Protection Program Borrower Application Form. DH is listed as the business name with an address of 2134 Martin Luther King, Flint, Michigan. SK is listed as the primary contact with an email address of s\*\*\*\*\*810@gmail.com and a business phone number ending in x6664. SK is listed as 100% owner of the company with an address of 5XXXX Highbury Ct, Shelby Township, Michigan. The form lists an average monthly payroll of \$225,613. The PPP application is signed in the name of SK on May 11, 2020.

22. Your affiant knows that the address on Highbury Ct is the home address of SAMER and ANASI. Both of their Michigan Drivers Licenses list this as their address. SK's driver's license lists an address in Davison, Michigan. SHABA's cell phone was seized during the execution of a search warrant on December 22, 2020. Phone number x6664, the phone number provided for SK on the DH PPP application, is saved as "Samer" in SHABA's phone.

23. Affiant interviewed SK in February of 2021. She advised her phone number ended in x4489. SK advised she owns DH and works there with her husband. She stated, since 2019, there have not been more than two employees working for her at the business. She did not know of any PPP loans in her name at the time of the interview and did not give anyone permission to get a PPP loan in her name. SK provided a voided check showing what bank account she used for DH, the account ended in x6067. SK indicated that she did not have an email address.

24. The Michigan Department of Licensing and Regulatory Affairs (LARA) system shows DH was incorporated in February 1993. SK was the only person listed on the business at incorporation and in all filings on the LARA website. The registered office address in all online filings was 2134 Martin Luther King, Flint, Michigan. The 2020 report lists SK as president of the company with the same address.

25. DH is a beer, wine, and liquor store operating at 2134 Martin Luther King, Flint, Michigan. It does not appear to be operating as a meat market with 28 employees as indicated on SBA documents. Below is a Google Maps image of the business.



26. Celtic provided IRS Tax Form 941s for all four quarters of 2019 and the first quarter of 2020 that were submitted in connection with DH's PPP application. IRS Form 941 is used by businesses to report their quarterly number of employees, wages paid, federal income tax withholdings, and other similar business expenses. All five forms show 28 employees and quarterly total wages, tips, and other compensation of \$669,368.10. All forms show to have been completed by a CPA who will be referred to as CB. SK is listed as President of the company on the

forms with a phone number ending in x6664; however, as noted above, that is SAMER's phone number.

27. Your Affiant spoke with Accountant CB who purportedly completed the forms. The CPA advised he has done work for the Kammo family in the past. CB was served with a subpoena for documents prepared for DH, CS, SAMER, ANASI, SK, and others.

28. CB provided records he prepared for certain of the subpoenaed entities. Records were provided for CS, but CB did not produce any tax documents for DH.

29. Celtic provided a Chase statement for account x370 from February 2020 that was submitted in connection with the DH PPP application. Below is an image captured from the statement:



February 01, 2020 through February 28, 2020  
Account Number: x9370

#### CUSTOMER SERVICE INFORMATION

Web site:	<a href="http://Chase.com">Chase.com</a>
Service Center:	<b>1-800-242-7338</b>
Deaf and Hard of Hearing:	1-800-242-7383
Para Espanol:	1-888-622-4273
International Calls:	1-713-262-1679

HOLD - RETURN MAIL  
D&H MARKET INC  
2134 MARTIN LUTHER KING  
FLINT MI 48503

#### CHECKING SUMMARY

Chase Total Business Checking

	INSTANCES	AMOUNT
<b>Beginning Balance</b>		<b>\$2411,299.32</b>
Deposits and Additions	83	28,565.51
ATM & Debit Card Withdrawals	29	-25,665.36
Electronic Withdrawals	4	-2,218.77
Fees	1	-15.00
<b>Ending Balance</b>	<b>117</b>	<b>\$2,383,400.19</b>

30. Chase was issued a subpoena and provided records for account x9370 referenced in this purported bank statement. Below is an image capture from the February 2020 statement provided by Chase:



JPMorgan Chase Bank, N.A.  
P O Box 182051  
Columbus, OH 43218 - 2051

February 01, 2020 through February 28, 2020  
Account Number: 9370

00023363 DRE 021 080 08020 NNNNNNNNNNNN 1 00000000 64 0099  
HOLD - RETURN MAIL  
ANASI DETROIT PROPERTY, LLC  
17333 W 8 MILE RD  
DETROIT MI 48235-2141

#### CUSTOMER SERVICE INFORMATION

Web site:	Chase.com
Service Center:	1-800-242-7338
Deaf and Hard of Hearing:	1-800-242-7383
Para Espanol:	1-888-622-4273
International Calls:	1-713-262-1679

#### CHECKING SUMMARY

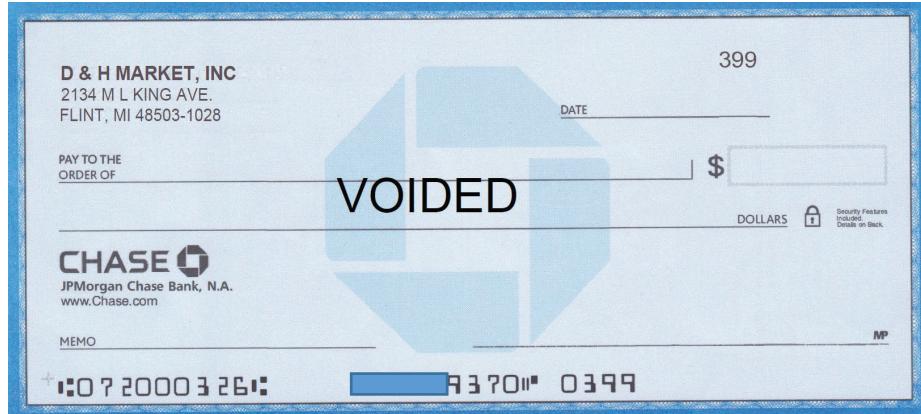
Chase Total Business Checking

	INSTANCES	AMOUNT
<b>Beginning Balance</b>		<b>\$1,299.32</b>
Deposits and Additions	83	28,565.51
ATM & Debit Card Withdrawals	29	-25,665.36
Electronic Withdrawals	4	-2,218.77
Fees	1	-15.00
<b>Ending Balance</b>	<b>117</b>	<b>\$1,965.70</b>

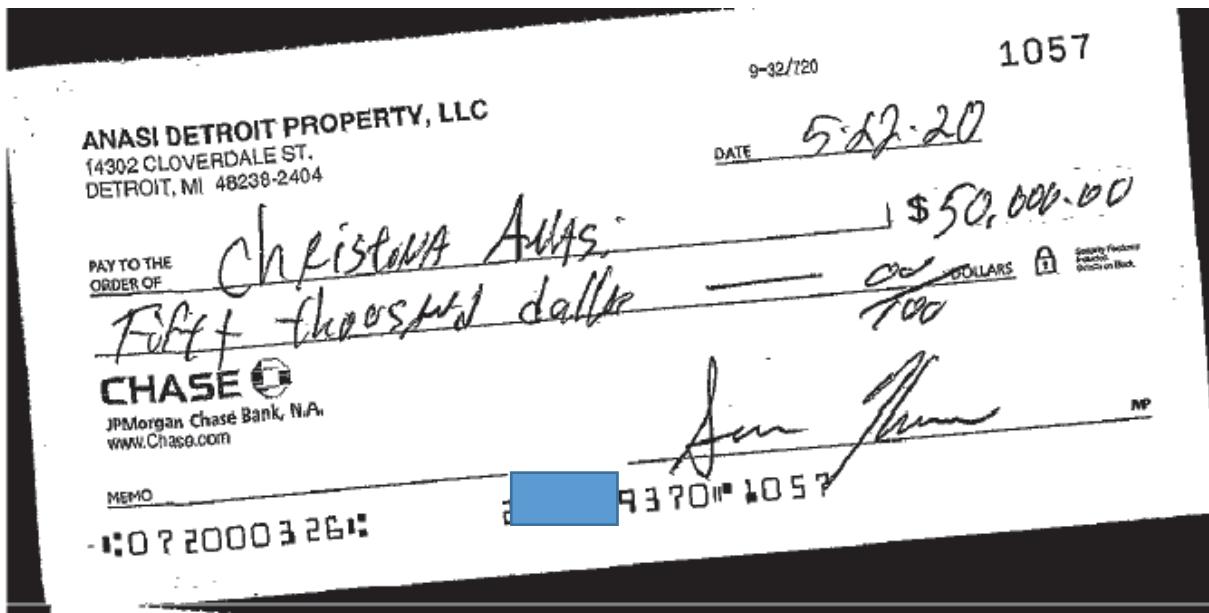
#### DEPOSITS AND ADDITIONS

The records provided by Chase show the statement submitted to Celtic in connection with the DH loan was altered. The beginning balance in the account was \$1,299.32, not "\$2411,299.32." Moreover, the balance entered on the statement submitted to Celtic was not in the proper format – were it issued by Chase, it would have read \$2,411,299.32.

31. Celtic provided an image of a voided check that was submitted in connection with the DH PPP loan application. Below is an image of the check:



32. Chase provided checks drawn on account x9370. Below is an image of an actual check drawn on the account:



It is clear that the check submitted to Celtic for the DH PPP loan was altered, the account name, address and check sequence number were not accurate.

33. Celtic provided ACH deposit records showing that on May 21, 2020, \$564,032 in PPP loan funds for DH were deposited into account x370, which, as noted above, was in the name of Anasi Detroit Property, LLC.

34. Chase Bank was issued a subpoena for records associated with ANASI and SAMER. Chase records show on May 22, 2020, \$564,032 was received into account x9370 from Celtic Bank, with a reference to D&H Market, Inc.. The same days as the deposit, the \$50,000 check displayed above was written to ANASI; a \$45,000 check was written to ANASI on this date as well, and a \$50,000 check was also written to C&S Liquor. The stamps on the back of the check all indicate they were deposited into Comerica Bank accounts. Between May 22, 2020 and November 12, 2020, there were 43 withdrawals from the account totaling \$371,000. It is evident the PPP funds were not being spent on DH nor were they being spent on authorized PPP expenses.

35. Celtic provided Blue Cross Blue Shield of Michigan statements which were submitted as part of the DH PPP loan application. The statement below was submitted to Celtic (filename provided by Celtic: "Invoice\_04-27-2020\_02-10-12"):



D&H MARKET INC  
 H [REDACTED], S [REDACTED]  
 5 [REDACTED] Highbury Ct  
 SHELBY TOWNSHIP MI 483152877

Coverage Contract #: 893459370 **UPDATED** \$2,802.06  
 Account #: 8934593700003710 | Date Billed: 02/18/2020 | Invoice Number: 082282120 | Billing  
 Period: 03/01/2020-03/31/2020 | Paid Through Date: 03/31/2020 Due 03/31/2020

#### Coverage details

S [REDACTED] K [REDACTED] \$475.27  
 Last Name: K [REDACTED] | First Name: S [REDACTED] | Contract Number: 8934593700003710 | Billed  
 From: 03/01/2020 | Billed Through: 03/31/2020 | Current Charges: \$475.27 | Contract Type:  
 Business | Benefit Description: BLUE CROSS PREMIER PPO SILVER SAVER

STEVEN KAMMO \$475.27  
 Last Name: KAMMO | First Name: STEVEN | Middle Initial: L | Contract Number:  
 8934593700003710 | Billed From: 03/01/2020 | Billed Through: 03/31/2020 | Current  
 Charges: \$475.27 | Contract Type: Business | Benefit Description: BLUE CROSS PREMIER  
 PPO SILVER SAVER

TIM [REDACTED] \$475.27  
 Last Name: [REDACTED] | First Name: TIM [REDACTED] | Contract Number: 8934593700003710 | Billed From:  
 03/01/2020 | Billed Through: 03/31/2020 | Current Charges: \$475.27 | Contract Type:  
 Business | Benefit Description: BLUE CROSS PREMIER PPO SILVER SAVER

SAMER KAMMO \$475.27  
 Last Name: KAMMO | First Name: SAMER | Contract Number: 8934593700003710 | Billed From:  
 03/01/2020 | Billed Through: 03/31/2020 | Current Charges: \$475.27 | Contract Type: Business |  
 Benefit Description: BLUE CROSS PREMIER PPO SILVER SAVER

If we do not receive full payment by the due date, you may not be able to use your benefits.  
 It may take 2-3 business days for your payment to reflect in your updated amount due.

AR ADJUSTMENTS	\$0.00
PRIOR AMOUNT BILLED	\$1,901.38
PAYMENTS RECEIVED	1,901.08
CURRENT ADJUSTMENTS	\$0.00
CURRENT PREMIUM AMOUNT	1,901.08
ADVANCED PREMIUM TAX CREDIT CURRENT	(\$900.98)
TOTAL AMOUNT DUE	\$2,802.06
<b>UPDATES TO BILL</b>	
<b>PAID THROUGH DATE</b>	<b>03/31/2020</b>
<b>UPDATED AMOUNT DUE</b>	<b>\$2,802.06</b>

36. During the search warrant executed on December 22, 2020 at SHABA's residence, her cell phone was seized. Examination of the phone revealed ANASI sent SHABA an attachment named "Invoice\_04-27-2020\_02-10-12" on April 27, 2020 (which is the same file name provided by Celtic for the image above). Below is the attachment ANASI sent SHABA:



KAMMO, SAMER  
5 [REDACTED] Highbury CT  
SHELBY TOWNSHIP MI 483152877

Coverage Contract #: 893459370 **UPDATED** \$0.00  
Account #: 8934593700003710 | Date Billed: 12/02/2018 | Invoice Number: 082282120 | Billing  
Period: 01/01/2019-01/31/2019 | Paid Through Date: 01/31/2019 Due 12/28/2018

#### Coverage details

CHRISTINA ANASI \$475.27  
Last Name: ANASI | First Name: CHRISTINA | Contract Number: 8934593700003710 | Billed  
From: 01/01/2019 | Billed Through: 01/31/2019 | Current Charge: \$475.27 | Contract Type:  
Family | Benefit Description: BLUE CROSS PREMIER PPO SILVER SAVER

A [REDACTED] KAMMO \$324.92  
Last Name: KAMMO | First Name: A [REDACTED] | Middle Initial: [REDACTED] | Contract Number:  
8934593700003710 | Billed From: 01/01/2019 | Billed Through: 01/31/2019 | Current Charge:  
\$324.92 | Contract Type: Family | Benefit Description: BLUE CROSS PREMIER PPO SILVER  
SAVER

A [REDACTED] KAMMO \$324.92  
Last Name: KAMMO | First Name: A [REDACTED] | Contract Number: 8934593700003710 | Billed From:  
01/01/2019 | Billed Through: 01/31/2019 | Current Charge: \$324.92 | Contract Type: Family |  
Benefit Description: BLUE CROSS PREMIER PPO SILVER SAVER

SAMER KAMMO \$529.21  
Last Name: KAMMO | First Name: SAMER | Contract Number: 8934593700003710 | Billed From:  
01/01/2019 | Billed Through: 01/31/2019 | Current Charge: \$529.21 | Contract Type: Family |  
Benefit Description: BLUE CROSS PREMIER PPO SILVER SAVER

If we do not receive full payment by the due date, you may not be able to use your benefits.  
It may take 2-3 business days for your payment to reflect in your updated amount due.

AR ADJUSTMENTS	\$0.00
PRIOR AMOUNT BILLED	\$1,349.58
PAYMENTS RECEIVED	(\$674.79)
CURRENT ADJUSTMENTS	\$0.00
CURRENT PREMIUM AMOUNT	\$1,654.32
ADVANCED PREMIUM TAX CREDIT CURRENT	(\$900.98)
TOTAL AMOUNT DUE	\$1,428.13
<b>UPDATES TO BILL</b>	
PAID THROUGH DATE	<u>01/31/2019</u>
<b>UPDATED AMOUNT DUE</b>	<b>\$0.00</b>

The document submitted to Celtic had been altered. The documents are similar but names, dates, addresses and amounts were altered.

37. SHABA's cell phone also had text messages regarding the BCBS invoice above. Text Messages involving SHABA and phone number ending in x8866 that is saved as Christina Tantune. Messages contain numerous references made to SAMER being the husband of phone number x8866. SAMER is ANASI's husband, and I believe SHABA's contact saved as Christina Tantune is, in fact, the contact for ANASI.

38. SHABA's seized phone contained a group chat with SHABA, ANASI and SAMER. There were thousands of messages regarding the various PPP loans involved in this investigation in that group chat. Below are some of the messages regarding sending the insurance document saved as "Invoice\_04-27-2020\_02-10-12":

- 4/27/2020: Sent by SHABA- Do you have your bcbs detailed billing for the whole year? So I can edit and make it look like you pay employee health care insurance
- 4/27/2020: Sent by SAMER- We don't have Health care do We??
- 4/27/2020: Sent by SAMER - A lot of stores don't
- 4/27/2020: Sent by SHABA- Your family does
- 4/27/2020: Sent by SAMER - Personal
- 4/27/2020: Sent by SHABA- Yeah send me the invoice but in pdf file
- .....

- 4/27/2020: Sent by SHABA- Bro if you have it send it you might as well abuse this forgivable loan I'm trying to help you get everything
- 4/27/2020: Sent by ANASI- We got our own insurance
- 4/27/2020: Sent by SHABA- I'm already up I know it's late but I get it.....free money
- 4/27/2020: Sent by ANASI- It's not from the business
- 4/27/2020: Sent by SHABA- I know I'm going to edit the names and put the employees names
- 4/27/2020: Sent by ANASI- U want every month
- 4/27/2020: Sent by SHABA- Yes please and this year
- 4/27/2020: Sent by ANASI:



(Affiant note: ANASI sent another 35 BCBS statements to SHABA after sending the one that was altered and submitted to Celtic.)

- 5/4/2020: Sent by ANASI- IMG\_3904:

Hi Sahira,

Thank you for applying to the Paycheck Protection Program with Funding Circle! As an approved PPP lender, actively working with the SBA, we are ready to do our part.

Thank you for uploading your documents! In order to prevent any delays in processing your application, please make sure you have uploaded all required documents in their entirety.

**Please note:** There is overwhelming demand by businesses to participate in the Paycheck Protection Program and government funds are available only for a limited time. Funding Circle is working hard to process your application in order to submit it to the SBA. However, we can not guarantee that you will receive a PPP loan.

Here is the checklist of required documents:

- Copy of voided check (for the business checking account)
- Valid ID or Driver's License for every owner above 20% (picture of front/back in color)
- 2019 Business Tax Return

If your 2019 Business tax return is not yet filed, we will require:

- **Payroll Verification**, one of the following:
  - 941 of Q1 2020 or Q4 2019
  - 944 of 2019
  - Statement from Payroll Service Provider (PEO)
- **Ownership Verification - Capitalization Table** (attached)

I will begin reviewing your application, and will reach out with any questions.

i.

(Affiant note: Celtic partnered with Funding Circle for PPP loans and would have been communicating with email address s\*\*\*\*\*810@gmail.com, the email account they had on file for the loan. This shows ANASI was communicating with the lender as SK, without SK's knowledge and consent.)

- 5/4/2020: Sent by SAMER- Ohh Yaaa

- 5/4/2020: Sent by ANASI- Rita what documents are u missing from the list
- 5/4/2020: Sent by SHABA- I submitted everything
- 5/4/2020: Sent by SHABA- I sent you the documents via email
- 5/4/2020: Sent by ANASI- Ok should we reply email
- 5/4/2020: Sent by SHABA- I submitted everything yeah reply

(Affiant note: The conversations above show ANASI was communicating with the lender as if she were SK. It also shows ANASI, SAMER and SHABA all conspired creating fake insurance documents to submit to the lender. It also shows all three knew DH did not actually provide health insurance to employees and SHABA was going to fraudulently edit the actual insurance records for SAMER and ANASI.)

39. SHABA and ANASI also sent text messages regarding the loan that did not include SAMER. Below are some of those messages:

- 4/25/2020- Sent by SHABA to ANASI- After this loan I'm blocking Samer. Bro I'm not going to lie I'm scared about this whole process. Because his mom hasn't filed taxes. And I don't like his mom but I still don't want anything to happen to her. I talked to Douglas loan officer and I had him look over the paperwork I told him I think my accountant has covid-19 I told him I was the mom. I was so nervous talking to him. Christina I made her taxes up. It's basically a fake ass application

and that's why I have a ughh feeling Anddddddd I'm praying to God they don't find out about D&H store.

- 4/25/2020- Sent by SHABA to ANASI - Here's another loan request.
- 4/25/2020- Sent by ANASI to SHABA- Nooo no more loans.
- 4/27/2020- Sent by SHABA to ANASI- Lol I'm sorry but I can't half ass his application is already fishy with his mom and I have to make sure everything is perfect. You better take a lot of that money for yourself and the kids. I know that's why I didn't want you in the application. Just in case they come after us.
- 4/27/2020- Sent by ANASI to SHABA- Yesterday he goes let's see what happens and we can switch the name to D&H and apply for my mom's store and keep the money.

40. Celtic provided records showing the DH PPP loan was submitted through IP address 68.46.155.171 (Comcast IP address). Comcast was subpoenaed for records regarding this IP address. Because of retention practices, Comcast only had records from January 28, 2021 through June 12, 2021. During this timeframe, the subscriber was Christina Kammo (ANASI) and the IP was assigned to her home address in Shelby Township, Michigan. Phone number ending in x8866 was assigned to the account; this was the number communicating in text messages detailed above with SAMER and SHABA as "Christina Tantune". Comerica Bank

also provided IP records associated with ANASI's accounts and there were hundreds of logins through this IP address, multiple from account [anasichristina@gmail.com](mailto:anasichristina@gmail.com) during April of 2020. Based on the Comerica and Comcast IP information, I believe this IP address was assigned to SAMER's and ANASI's residence during the time of the DH PPP loan application submission.

41. SHABA texted that she submitted all of the documents requested by the lender. The loan process typically consists of submitting the initial SBA PPP Loan Application to a lender, which it appears was done by ANASI for this loan. After receiving the PPP Loan Application, lenders typically ask for supporting documents and this did occur. It appears ANASI was operating the email account and that SHABA submitted the requested documents while ANASI was communicating with the lender.

42. Affiant reviewed thousands of SHABA's text messages with ANASI and SAMER. There were numerous text messages indicating SAMER had minimal if any computer skills and abilities. Text messages indicated ANASI handled almost all computer related activities for SAMER. Based on the messages it is unlikely any PPP loans applications were submitted from ANASI and SAMER's residence by SAMER rather than ANASI.

43. During the investigation \$233,583.08 of the remaining DH PPP loan proceeds were seized from multiple bank accounts pursuant to a seizure warrant issued by this court.

**C&S Liquor (CS) PPP loan**

44. The SBA provided records for a PPP loan issued to C&S Liquor (CS). PPP Loan 45597073-07 that was approved through CRF Small Business Loan Company (CRF). The loan amount was \$75,500 and was approved on or about April 29, 2020. The mailing address and project address for the loans is 1XXXX West 8 Mile Rd, Detroit, Michigan. The CS average monthly payroll listed on the application form is \$30,602. The application form indicated the proceeds were to be used for payroll costs. In SBA loan records, CS is described as a convenience store with four employees. SK is listed as the authorized representative for CS with a Grand Blanc, Michigan address listed. A phone number ending in x9790 and email address of f\*\*\*\*\*719@gmail.com is listed for SK.

45. LARA records indicate CS was dissolved on July 15, 2020. LARA lists 1XXXX Baldwin Circle, Holly, Michigan as the company address. The registered agent of the business is SK. The business was incorporated on May 22, 2012. Annual reports for CS were filed through 2017; nothing has been filed since March 9, 2017. The 2017 annual report lists SK as the president, secretary, and treasurer of the company.

46. CRF was issued a subpoena for records regarding the CS PPP loan. CRF provided an SBA PPP Borrower Application Form that was submitted for the CS PPP loan. The form lists phone number ending in x6664 as the phone number for the loan; as noted above, this is SAMER's cell phone. The form lists SK as the primary contact and 100% owner of the company. SAMER and ANASI's address is listed for SK. The form lists four employees and a monthly payroll of \$30,602. The application form purports to have been signed by SK on May 6, 2020.

47. CRF provided records showing the PPP loan was submitted through IP Address 96.85.123.41. This IP is assigned to the Doctor's Office SHABA works at.

48. CRF also provided W-2s that were submitted as supporting documents for the CS PPP loan. A submitted 2019 W-2 shows SAMER received wages of \$90,130.92 and SK received wages of \$104,746.43. The Michigan Department of Treasury provided records pursuant to a subpoena. SAMER and ANASI's joint returns show they were paid total wages of \$26,000 by CS in 2018, \$45,500 by CS in 2019 and \$37,000 by CS in 2020 (with no differentiation of which of them received the wages.). The State of Michigan Treasury was not able to locate any tax records for SK. The Treasury return shows the W-2s were fictitious. The text message between SHABA and ANASI on April 25, 2020 listed above confirms they knew SK had not filed taxes and stated SHABA made up SK's tax documents. ANASI was aware these fictitious tax documents were used to obtain the PPP loan.

49. CRF also provided emails regarding the PPP loan for CS. The emails below were provided by CRF:

**From:** Rita Shaba <[ritashaba13@gmail.com](mailto:ritashaba13@gmail.com)>  
**Sent:** Wednesday, April 29, 2020 1:05 PM  
**To:** Douglas [REDACTED]@crfusa.com>  
**Cc:** samer kammo <[samerkammo@gmail.com](mailto:samerkammo@gmail.com)>  
**Subject:** Re: Link for Spark PPP Program

Please make sure

Hi Douglas,

Just following up with the status of my application, did you by any chance hear anything back?

Thank you,

Sahira Kammo

586.907.6762



Mon 5/25/2020 8:12 PM

Rita Shaba <[ritashaba13@gmail.com](mailto:ritashaba13@gmail.com)>

Forgiveness

To  samer kammo;  anaschristina@gmail.com;  Rita Shaba;  Douglas [REDACTED]



PPP Interim Final Rule\_0.pdf

265 KB

<https://www.sba.gov/sites/default/files/2020-04/PPP%20Interim%20Final%20Rule=0.pdf>

This first email shows SHABA was communicating with the lender, acting as SK and SAMER was cc'd on the email. The phone number at the bottom of the email is SHABA's, it was the number assigned to the cell phone seized from her person during the search warrant at her residence and subpoenaed Verizon records confirm the number is assigned to SHABA. The second email shows SHABA emailed the lender with SAMER and ANASI cc'd on the email. All three knew about the PPP loan and were part of the process.

50. CRF also provided health insurance records that were submitted with the PPP loan application. The version of the altered BCBS document discussed above that was submitted for the DH PPP loan was also submitted for this loan. The only difference was this fictitious document listed C & S LIQUOR INC as the business name. SAMER and ANASI also both acknowledged in their text messages with SHABA that CS does not provide health insurance.

51. CRF provided a 2019 IRS Form 1120s that was submitted in connection with the CS PPP loan application. The form lists CPA CB as the preparer. This form lists many of the exact same amounts and preparer that SHABA submitted to obtain a PPP loan for her company Forever Beauty. The only notable difference was the business information. CB was interviewed and advised he did not complete either of these forms.

52. Comerica records for account x9259, in the name of C&S Liquor, Inc., show the account received a \$75,500 deposit on May 7, 2020. SBA records show this deposit was an SBA PPP loan issued to C&S Liquor. On May 8, 2020, check 3128 was made out for \$50,000 to ANASI, and on May 9, 2020, check 3129 was made out for \$25,500 to ANASI. Stamps on the back of both checks indicate they were deposited into a Comerica account.

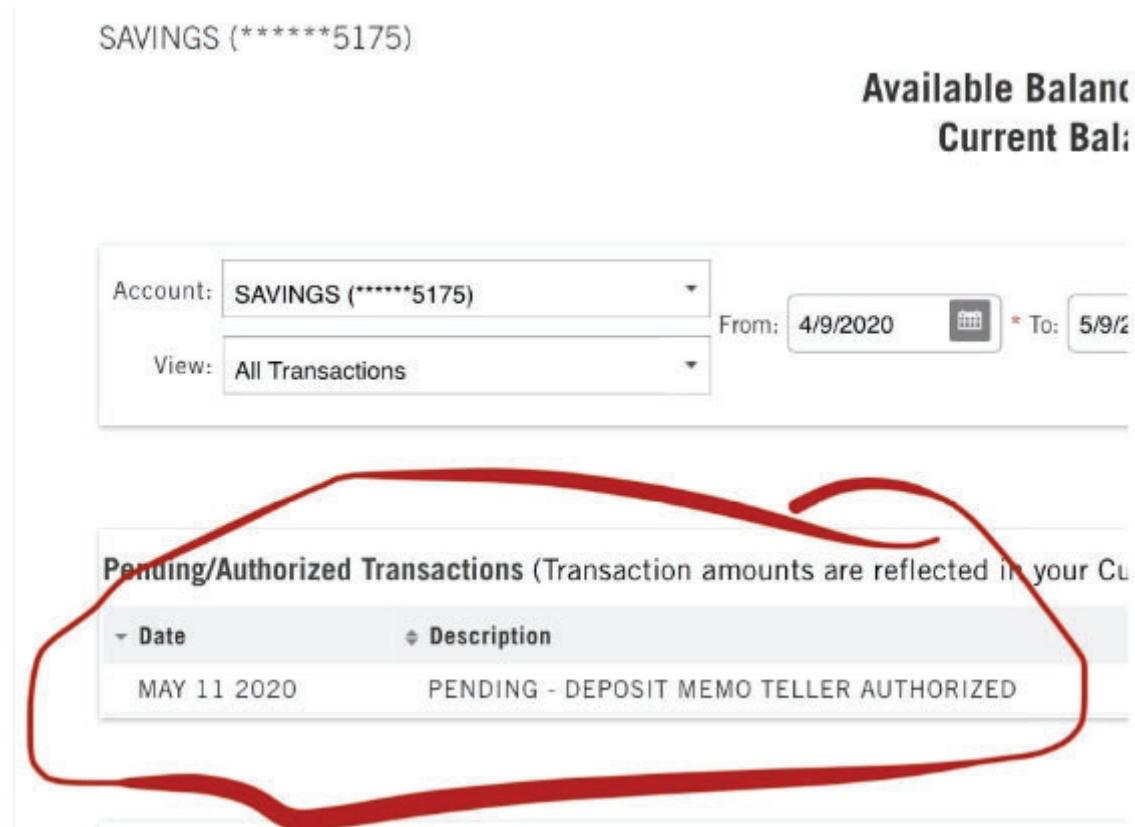
53. SHABA's cell phone contained the following messages between her and ANASI:

- 5/2/2020- Sent by ANASI- Dude it says void check for C&S
- 5/2/2020- Sent by SHABA- Do you know how to do that
- 5/2/2020- Sent by ANASI- Yeah but it's not C&S
- 5/2/2020- Sent by SHABA- Fuck
- 5/2/2020- Sent by ANASI- Mine is my personal
- 5/2/2020- Sent by SHABA- What should we do
- 5/2/2020- Sent by ANASI- We should put it in C&S and I'll write a check from there
- 5/2/2020- Sent by SHABA Okay whatever works
- 5/2/2020- Sent by ANASI- Or should I edit the name

This exchange shows ANASI was reviewing what documents were needed for the CS PPP loan and needed a voided CS check. ANASI indicates that she wants to

have the funds deposited into the CS account and that said she would “write a check from there,” which is what she did with the PPP proceeds.

54. SHABA’s cell phone also contained the following image sent by ANASI:



This image shows ANASI was monitoring Comerica account x5175. Records provided by Comerica show account x5175 is titled “Christina Anasi ITF Samer L Kammo”. On May 11, 2020, this account received a \$25,500 deposit of a check from CS’s X9259 account written to ANASI. Account x5175 also received a \$50,000 check deposit on May 8, 2020. This was also a check written to ANASI from x9259 consisting of CS PPP loan proceeds. In summary, the entire CS PPP

loan, \$75,500, was transferred to ANASI's personal account until it was seized during this investigation. The loan proceeds were not spent on any SBA PPP loan authorized expenses.

55. It is clear the PPP loan to CS is based on fraudulent representations, based on actual CS records completed by CPA CB, CS reported to the IRS quarterly wages, tips, and other compensation of \$6,500 to \$16,900, during 2019 and 2020. The company did not have a monthly payroll of \$30,602, and there is no evidence of this amount of payroll in the CS bank account. ANASI, SAMER and SHABA conspired to obtain this PPP loan based on fraudulent representations and ANASI received the fraudulent loan proceeds.

**Different Flavors 14355 (FLAVORS) PPP loan**

56. As noted above, a PPP loan application for FLAVORS was previously denied by Fundbox due to suspected fraud. FLAVORS later submitted a PPP loan application to First Home Bank (FHB) in July 2020. FHB is an FDIC insured bank that handles personal and business banking. FHB has five locations, all within the state of Florida. This PPP loan was approved. The SBA was contacted and provided documentation for a PPP loan issued to FLAVORS by FHB.

57. According to the SBA documents, Loan 94349781-06 was approved to be funded to FLAVORS on July 28, 2020. The loan was approved for \$520,800.00. The loan mailing address and project address provided to the SBA was 14355

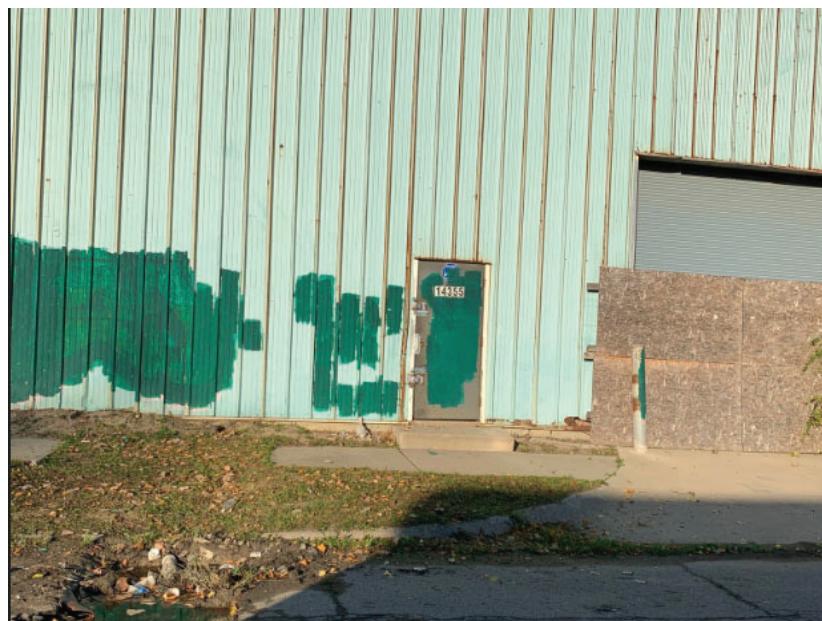
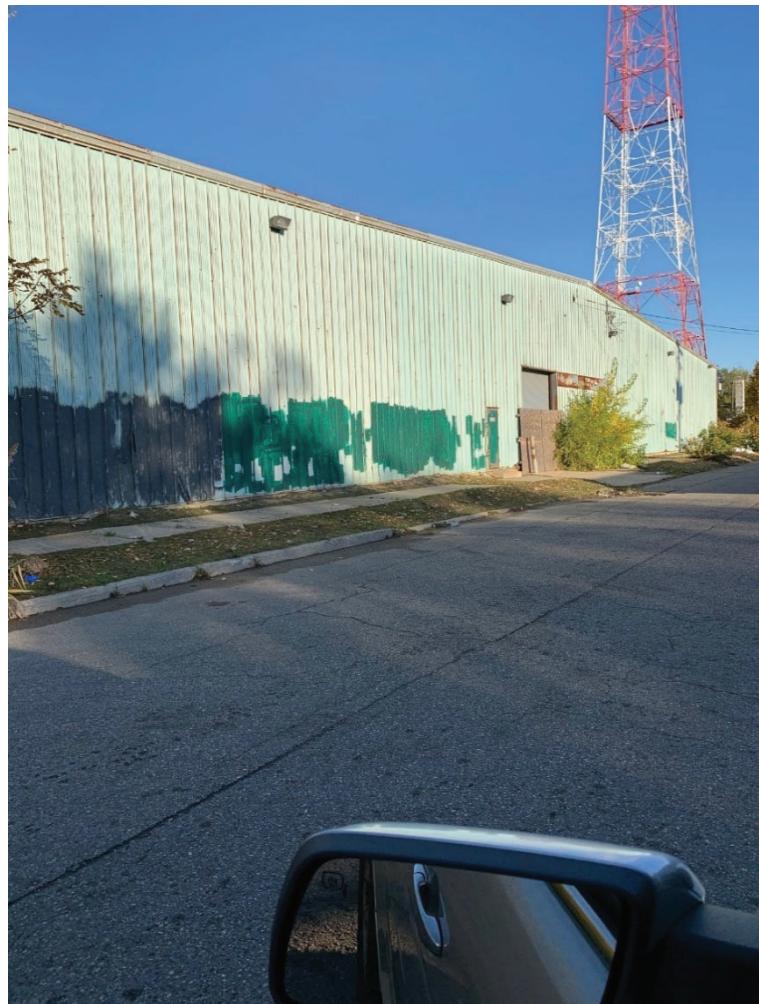
Cloverdale Street, Detroit, Michigan 48238. The SBA documents identified FLAVORS as an “Ice Cream and Frozen Dessert Manufacturing” business with 17 employees. SBA records show FLAVORS was established on October 19, 2018, and identify an individual who will be referred to as “BA” as the only principal associated with the business.

58. The Michigan Department of Licensing and Regulatory Affairs (LARA) system shows BA as the registered agent for FLAVORS; BA is also listed as the president, treasurer, secretary, and director of the company. 14355 Cloverdale Street, Detroit, Michigan 48238, is listed as BA’s address and the mailing address for FLAVORS.

59. Section 5 of the LARA annual report requires businesses to “Describe the general nature and kind of business in which the corporation is engaged in during the year covered by this report.” The answer provided by FLAVORS on March 17, 2020, reads “MEDICAL MARIJUANA FACILITY PREPARATION. THIS COMPANY IS ENGAGED IN THE APPLICATION PROCESS WITH THE STATE OF MICHIGAN TO BE A MEDICAL MARIJUANA FACILITY.” This directly contradicts the statement that FLAVORS is operating as an “Ice Cream and Frozen Dessert Manufacturing” company as noted in SBA loan records for FLAVORS.

60. The internet search did locate a State of Michigan, Marijuana Licensing Report for July 27, 2020, through July 31, 2020. The report lists FLAVORS as a “Grower Class C,” located at 14355 Cloverdale Street, Detroit, Michigan with a status of “Prequalification Approval.” BA and his spouse are listed as the supplemental applicants. This shows FLAVORS is a company operating in the marijuana industry. SBA rules indicate marijuana businesses were not eligible to receive PPP loans.

61. On Friday, October 16, 2020, at approximately 10:00 AM, HSI Special Agent David Green took photographs of 14355 Cloverdale. Below are some of the photographs.

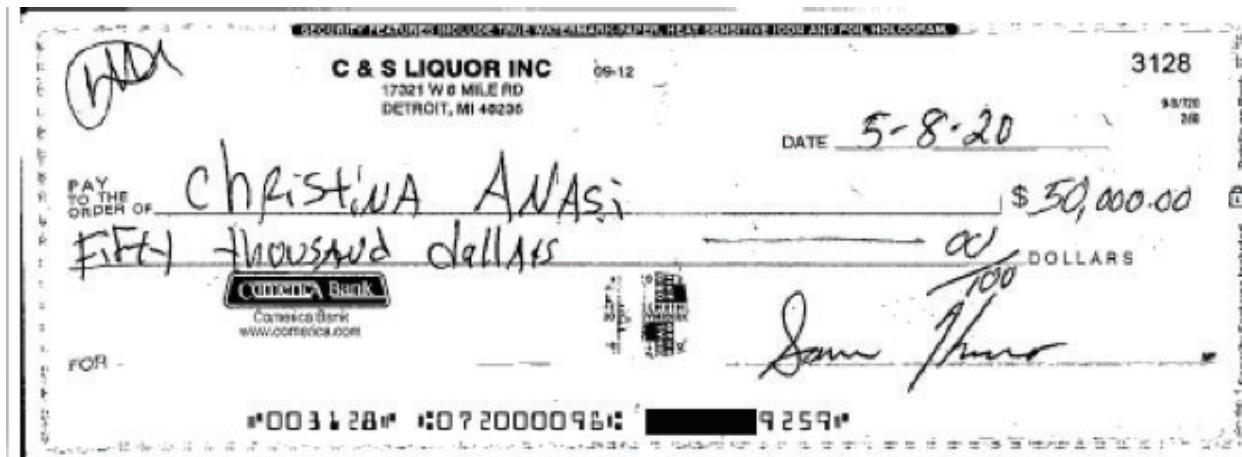


62. Special Agent Green advised the building appeared to be abandoned. He did not observe any vehicles parked around the building or in the area suggesting a business was in operation. The building was boarded up and the only identifiable entrance had two large padlocks securing it. The boarded up entrances appeared to be weathered and vegetation was growing in front of them. Based on the photographs and observations by Special Agent Green, there did not appear to be an “Ice Cream and Frozen Dessert Manufacturing” business operating at this location.

63. First Home Bank was subpoenaed for records regarding the FLAVORS PPP loan. Bank statements and a voided check were provided as part of the application for the PPP loan. Below is a statement and the check that was provided for the PPP loan application for FLAVORS:



64. After being issued a subpoena, Comerica provided the actual June 2020 statement and checks for account ending in x9259. Below is the actual statement and check:



80248  
C & S LIQUOR INC  
17321 W 8 MILE RD  
DETROIT MI 48235-2141

**Basic Business Checking statement**

June 1, 2020 to June 30, 2020  
Account number [REDACTED] 9259

**Account summary**

Beginning balance on June 1, 2020	\$4,019.33
Plus deposits	
Electronic deposits	\$15,878.40
Paper deposits	\$123,045.16
Less withdrawals	
Checks	-\$94,736.64
Electronic (EFT) withdrawals	-\$30,778.86
Fees and service charges	-\$321.54
Ending balance on June 30, 2020	\$17,105.85

**To contact us**

Call  
(800) 643-4418  
Hearing impaired (TDD 800 822-6546)

Visit our web site  
www.comerica.com

Write to us  
COMERICA BANK  
PO BOX 75000  
DETROIT, MI 48275-8248

**Important information**

The Account Balance Fee for this statement period for this account is \$0.00/\$1,000.  
The Account Balance Fee for this statement period for this account is \$0.00/\$1,000.

The x9259 documents provided by Comerica show the documents submitted to First Home Bank were fraudulent. The name and address on the account were completely

different and the balances were not the same. The transactions during this statement period were also different from the actual x9259 statement.

65. First Home Bank also provided 2019 IRS Form 941s that were submitted in connection with the FLAVORS PPP loan application. The forms for all four 2019 quarters list 17 employees and \$621,664 in quarterly wages, tips and other compensation. The form lists CPA MF as the preparer. The Michigan Department of Treasury was subpoenaed and could not locate any tax records for FLAVORS from 2015 through 2019.

66. CPA MF was interviewed by your Affiant. MF had never heard of this company and indicated that he did not complete the IRS Form 941s that purport to be prepared by him. MF had been contacted by SAMER but did not do any work for him. MF indicated that he did create tax documents for SHABA and her company Forever Beauty.

67. Your Affiant interviewed BA, the purported applicant for the FLAVORS PPP loan. BA did not know about the loan and did not give anyone consent to apply for a loan in his name. BA indicated that he previously was going to start a marijuana business with SAMER. BA indicated that he had purchased the property on Cloverdale Street but the business was never in operation.

68. SHABA's phone contained the following messages regarding BA and the FLAVORS PPP loan:

- 8/11/2020- Sent by ANASI- What about b\*\*\*\*?

(Affiant note: b\*\*\*\* is BA, the FLAVORS applicant.)

- 8/11/2020- Sent by ANASI- Dude bank was that with
- 8/11/2020- Sent by SHABA- C&S account
- 8/11/2020- Sent by ANASI- Rejected To?
- 8/11/2020- Sent by SHABA- No (BA) got approved last night
- 8/11/2020- Sent by SHABA- \$520,800

The FLAVORS PPP loan was deposited into the CS account, it is clear ANASI knew about the loan. ANASI also stated in text messages above regarding the CS PPP loan that she could write checks out of the CS account, showing he had access to the account.

69. \$205,898.76 of the remaining PPP loan proceeds for FLAVORS were seized during the investigation pursuant to a seizure warrant issued by this court.

#### **Wireless Plus Cellular PPP loan**

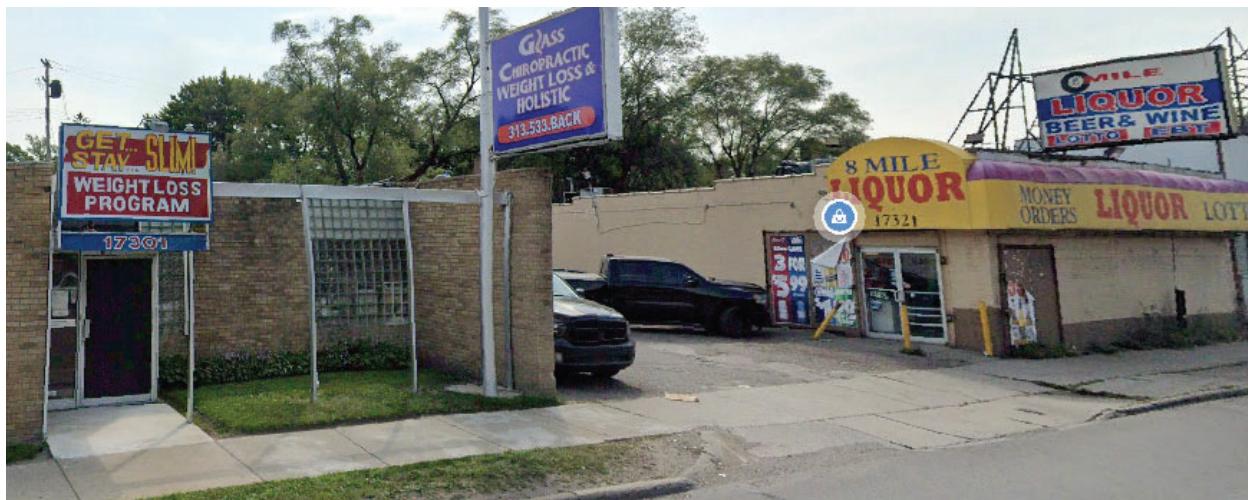
70. The SBA located a \$557,807 PPP loan for Wireless Plus Cellular (WPC) issued by Harvest Small Business Finance, LLC. The authorized representative and signor for WPC's PPP loan application was SAMER.

71. SBA records identify PPP loan 17884678-08 was approved for WPC in the amount of \$557,807. The loan was entered with the SBA on May 22, 2020, and showed a status of "Disbursed Current" on June 6, 2020. The mailing address and

project address provided to the SBA is 17317 W 8 Mile Road, Detroit, Michigan. In SBA records, the business nature is listed as “Wireless Telecommunications Carriers” and lists 28 current employees. SBA documents identify SAMER as the president and 100% owner of the company.

72. LARA records show SAMER as the registered agent for WPC. His name is the only name associated with the business. The address listed for the company is 17317 W 8 Mile Road, Detroit, Michigan. LARA indicates WPC was organized in November 2018. The initial filing for WPC and a 2020 annual statement are the only records in LARA for WPC. The 2020 annual report was filed on May 15, 2020, a week before a PPP loan was applied for by WPC.

73. Below is a Google Maps image of 17301 and 17321 W 8 Mile Road, Detroit, Michigan. There does not appear to be any building with an address of 17317 W 8 Mile Road.



74. A LARA search for business entities owned by SAMER indicates he is the owner of 17321 W 8 Mile Road. It is operating as ANASI DETROIT PROPERTY, LLC (ADP). There have not been any filings in LARA since 2018 when the ADP address was changed to this location from a location in Grand Blanc, Michigan. The actual location of CS is 17321 W 8 Mile Road.

75. There does not appear to be a “Wireless Telecommunications Carriers” company with 28 employees operating at any of these listed locations.

76. Harvest was served with a subpoena for records regarding the WPC PPP loan. Harvest provided IRS Form 941s submitted with the PPP loan application for WPC. A total of five forms were submitted: all four quarters of 2019 and the first quarter of 2020. All forms list 28 employees and \$669,368.10 in quarterly wages, tips, and other compensation. SAMER is listed as the President of the company and CPA CB is listed as the preparer on all the submitted IRS Form 941s for WPC. These exact employee and wage numbers were also submitted to fraudulently obtain the DH PPP loan. The same wage amount was also listed on an IRS Form 941 submitted by SHABA to obtain a PPP loan for Queen of the Green but this form listed CPA MF as the preparer.

77. CPA CB was interviewed and advised he did not complete these forms and had never heard of the company. The Michigan Department of Treasury

determined WPC had not filed any state tax returns for tax years 2018 and 2019, indicating the company was not in business.

78. In August 2022, a grand jury records subpoena was served to Wireless Plus requiring the production of business records from January 1, 2019 onwards. On August 23, 2022, counsel for SAMER, who accepted service of the subpoena on behalf of the company, indicated in an email that “[a]fter speaking to my client, he states that this business has not been in existence since 2016 or 2017, and therefore there are no records that fall within the time frame of your request.”

79. Harvest provided a SBA PPP Borrower Application form for WPC. The form lists SAMER as the President and 100% owner of the company. The form lists 28 employees with an average monthly payroll of \$233,122.70 and appears to have been signed by SAMER on May 21, 2020. Because the business was not actually operational, these are false representations.

80. IP Address records provided by Harvest show the WPC PPP loan was submitted through IP Address 174.230.129.110, email address sammerkammo@gmail.com and the record was created on May 15, 2020. Comerica Bank later provided IP Address records for ANASI and SAMER account logins. Records show this IP Address was used on May 14, 2020 by anasichristina@gmail.com to access ANASI’s personal bank accounts x4936 and x5175.

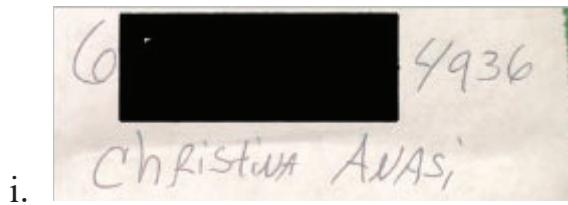
81. Harvest provided a bank statement that was submitted in connection with the WPC PPP loan application. The February 2020 statement lists “WIRLESS PLUS CELLULAR 17317 W 8 Mile RD Detroit MI 48234-2141” with an account number of x9267 and an ending balance of \$319,013.99.

82. Pursuant to a subpoena, Comerica provided the actual statements for account x9267. The account did not have a statement for specifically February of 2020 but there was a statement for December 1, 2019 through May 31, 2020. The account is actually titled “C & S DETROIT PROPERTY LLC 17321 W 8 MILE RD DETROIT MI 48235-2141” and had a balance of \$29.34 prior to receiving the WPC PPP loan proceeds. The statement submitted to Harvest had been altered, in February of 2020 the account was dormant with only \$29.34. The x9267 records also show the PPP loan proceeds were not spent on authorized expenses.

83. SHABA’s cell phone contained text messages between ANASI, SAMER and SHABA regarding the WPC PPP loan, below is a summary of messages:

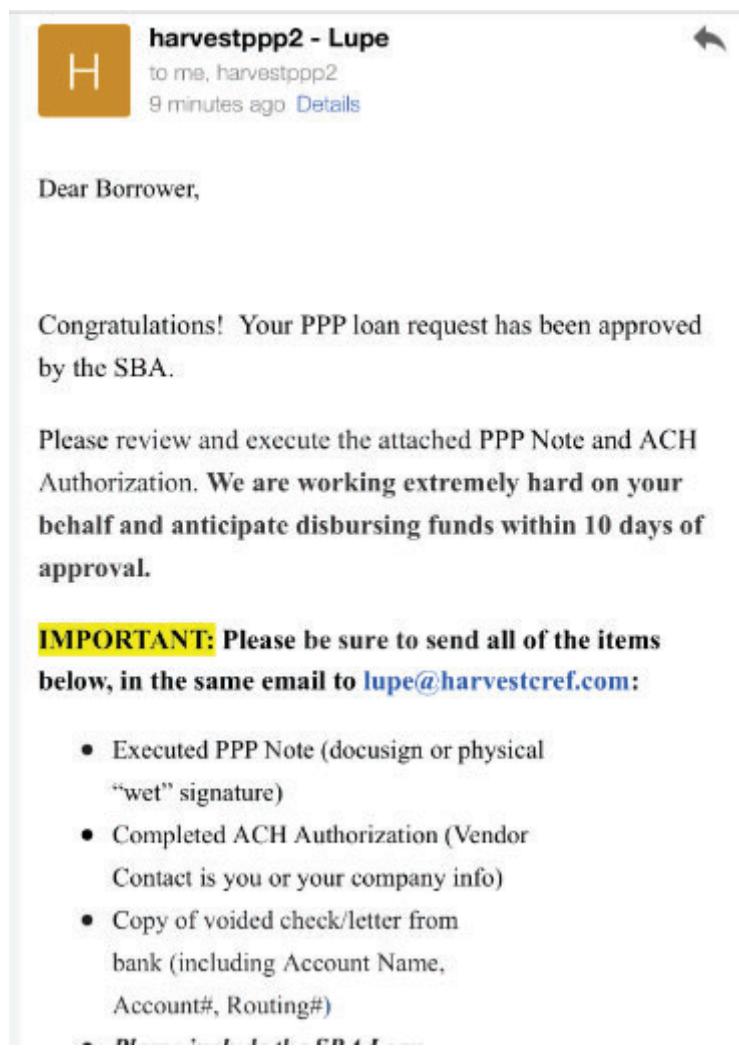
- 5/5/2020- Sent by SHABA- Give me check info
- 5/5/2020- Sent by SHABA- for wireless
- 5/5/2020- Sent by SHABA- Bank name
- 5/5/2020- Sent by SHABA- Should I just use c&s
- 5/5/2020- Sent by ANASI- Use my bank account

- 5/5/2020- Sent by ANASI- IMG\_3921



(Affiant note: This image lists bank account ending in x4936, this is a Comerica account held in ANASI's name in trust for SAMER.)

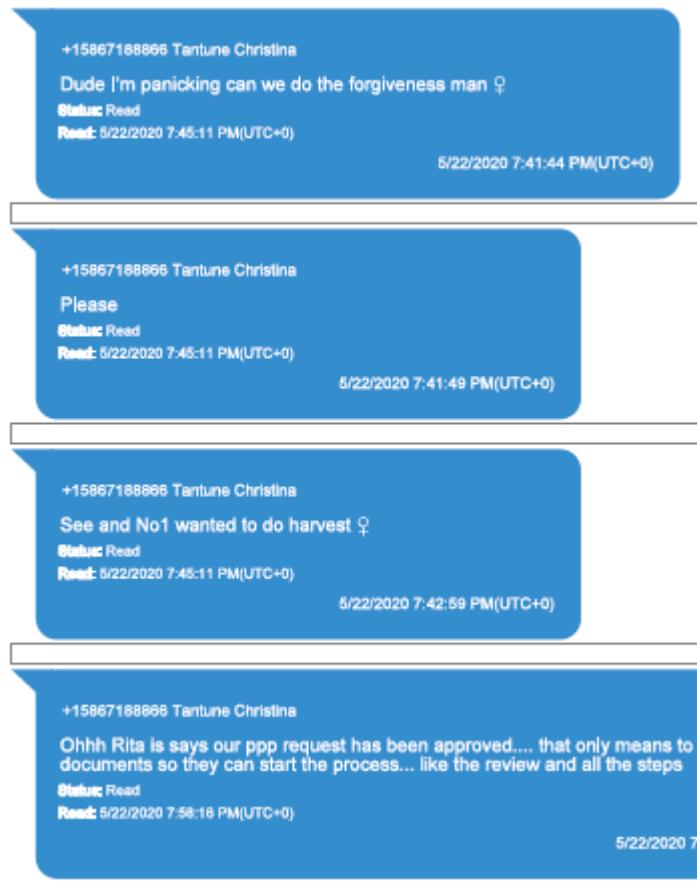
- 5/22/2020- Sent by SHABA- Why aren't you guys checking emails wtf
- 5/22/2020- Sent by ANASI- IMG\_4187



i.

(Affiant note: Harvest communicated with email address sammerkammo@gmail.com. The message above shows ANASI had access to this email account.)

- 5/22/2020- Sent by ANASI- omg
- 5/22/2020- Sent by SHABA- Damn rags to riches
- 5/22/2020- Sent by SHABA- lol!
- 5/22/2020- Sent by SAMER- Omg I'm falling down Some one catch me
- .....



(Affiant note: The conversation above shows ANASI, SAMER and SHABA were all involved in the process of applying for the fraudulent WPC PPP loan.)

**ANASI Financial Summary**

84. Comerica and JPMorgan Chase Banks provided records for multiple accounts associated with SAMER and ANASI, pursuant to a subpoena. The table below shows CS and WPC PPP loan proceeds being transferred into ANASI's personal accounts:

**PPP Funds Transferred to Christina Anasi ITF Samer Kammo x5175 (Comerica)**

**Account**

Date	From	Disbursed To	Tier 1	Tier 2
5/07/2020	CRF PPP Loan (CS)	C&S Liquor x9259 (Comerica)	\$75,500	
5/08/2020	C&S Liquor x9259 (Comerica)	Christina Anasi x5175 (Comerica)		\$50,000
5/11/2020	C&S Liquor x9259 (Comerica)	Christina Anasi x5175 (Comerica)		\$25,500
5/22/2020	Celtic Bank PPP Loan (WPC)	Anasi Detroit Property x9370 (JPMC)	\$564,032	
5/22/2020	Anasi Detroit Property x9370 (JPMC)	Christina Anasi x5175 (Comerica)		\$50,000
			<b>Total x5175=</b>	<b>\$125,500</b>

**PPP Funds Transferred to Christina Anasi ITF Samer Kammo x4936 (Comerica) Account**

Date	From	Disbursed To	Tier 1	Tier 2	Tier 3
5/22/2020	Celtic Bank PPP Loan (WPC)	Anasi Detroit Property x9370 (JPMC)	\$564,032		
5/22/2020	Anasi Detroit Property x9370 (JPMC)	Christina Anasi x4936 (Comerica)		\$45,000	
5/22/2020	Christina Anasi x4936 (Comerica)	Kammo, Steve (Gift for Home)			\$30,000

<b>Total</b>	
<b>x4936=</b>	<b>\$45,000</b>

From December 2019 through the end of April 2020 ANASI's checking account x4936 maintained a balance of \$20,000 or less and her savings account x5175 maintained a balance of about \$3,000. \$125,500 in fraudulently obtained PPP loan proceeds were transferred to ANASI's savings account and \$45,000 to her checking account. Within a day of the \$45,000 being transferred to ANASI's checking account, a \$30,000 check was written to Steven Kammo (SAMER KAMMO's Brother) noting "Gift For Home". The check appears to have been endorsed by ANASI. These funds are not being used for PPP authorized purposes, Steven Kammo was in the process of purchasing a home and was provided PPP proceeds to use for that purchase. The \$125,500 transferred into x5175 remained in the account until it was seized during this investigation.

85. All of the fraudulently obtained CS PPP loan proceeds were transferred into ANASI's personal account shortly after being received. Text messages discussed above between ANASI and SHABA indicate that ANASI wanted the money in her personal account. ANASI ended up with all of the CS PPP loan proceeds transferred into her personal account as she indicated in the text messages. The messages also showed ANASI had access to the accounts and stated the accounts were in fact her accounts. Also an additional \$50,000 of the WPC PPP

loan proceeds were transferred into ANASI's account. These PPP loan proceeds were not used for PPP authorized expenses.

**Additional SHABA Phone Evidence**

86. ANASI and SHABA exchanged thousands of text messages, many regarding fraudulent activities. Below are additional messages between ANASI and SHABA:

- 4/15/2020- Sent by SHABA- Samer wants me to fill out these forms but I don't feel comfortable asking for the business banking account information and I don't want to have that personal information. So you can fill out this application. I will send you the answers.
- 4/15/2020- Sent by ANASI- They just act dumb...I've showed him how to forward an email about 500 times and he still don't know how to do it.
- 4/15/2020- Sent by ANASI- Girl....don't get married

(Affiant Note: These last two messages indicate SAMER does not know how to forward an email, speaking to his lack of computer abilities.)

- 4/15/2020- Sent by ANASI- Yea but samer doesn't have a personal banking account
- 4/15/2020- Sent by SHABA- So when he files for taxes does the refund check come in the mail

- 4/15/2020- Sent by ANASI- Yup

(Affiant Note: These last three messages confirm accounts x4936 and x5175 are ANASI's accounts and not under SAMER's control.)

- 4/15/2020- Sent by SHABA- I wish I was getting unemployment I seriously tried every scam possible to get some type of check and I got denied for everything.
- 4/21/2020- Sent by SHABA- Can you check Samer's email for me and see if he received anything from DEGC small business program please.
- 4/21/2020- Sent by ANASI- Hey babe.. no I don't see anything
- 4/23/2020- Sent by SHABA- Do you want direct deposit or have a card like samer
- 4/23/2020- Sent by ANASI- Direct
- 4/23/2020- Sent by SHABA- Login and enter you bank information
- 4/23/2020- Sent by SHABA- Can you apply for that loan again please.
- 4/23/2020- Sent by ANASI- I checked on it yesterday and I just did again
- 4/24/2020- Sent by ANASI- What kind of self employed work do I do? Cashier?
- 4/24/2020- Sent by SHABA- No say assistant manager and Samer is the manager.

- 4/24/2020- Sent by SHABA- Because I backed dated it so you can get more money.
- 4/24/2020- Sent by ANASI- And I added by bank account info... samer can wait for his check that's never gonna come
- 4/24/2020- Sent by SHABA- Don't let him take any loans out under your name
- 4/24/2020- Sent by ANASI- I got my own bank account.... And whatever goes in don't come out
- 4/24/2020- Sent by ANASI- Samer isn't cheap that's whyyyy I don't trust him cuz he blows all his money
- 4/25/2020- Sent by SHABA- It's basically a fake ass application and that's why I have a ughhhh feeling
- 4/25/2020- Sent by ANASI- Anddddd I'm praying to God they don't find out about D&H store
- 4/28/2020- Sent by SHABA- And the total is...\$75,500.

(Affiant note: as discussed above, CS received a fraudulent \$75,500 PPP loan.).

- 5/2/2020- Sent by ANASI- We should put it in C&S and I'll write a check from there.
- 10/9/2020- Sent by SHABA- They caught us.
- 10/9/2020- Sent by SHABA- Slewai

- 10/9/2020- Sent by SHABA -They caught him.
- 10/9/2020- Sent by SHABA - I'm talking to Samer.

(Affiant note: This exchange on October 9, 2020 occurred after a seizure warrant was executed on October 9, 2020 for proceeds of a fraudulent PPP loan to JD Hydro LLC. The JD Hydro PPP loan was submitted from the Doctor's Office and the loan was in the name of SA, SAMER's cousin. SHABA communicated with ANASI and SAMER regarding the seizure. Seizing these funds was the first overt investigative activity during the investigation.)

#### **Unemployment Insurance Fraud**

87. The text messages above along with many other messages not included in this affidavit, appear to also show SHABA instructed ANASI on how to fraudulently obtain Unemployment Insurance benefits.

88. Records from the State of Michigan show that ANASI applied for unemployment insurance benefits in April 2020. As part of the application, ANASI submitted a purported 1099 tax form for 2019 showing that she had earned \$78,350 in nonemployee compensation from C & S Liquor, Inc. ANASI also indicated on the unemployment insurance benefit application the same income information. ANASI requested that her unemployment benefits be paid to account x4936, which, as noted above, is an account in her name.

89. Tax records from CPA CB demonstrate that C&S did not, in fact, issue a 1099 tax form to ANASI for tax year 2019 and the only income reported jointly by ANASI and Samer that year was \$45,500 from C&S Liquor, which was the amount paid to Samer Kammo, not ANASI, as reflected in a W-2 tax record issued to Samer Kammo.

90. State of Michigan records show that ANASI's unemployment insurance claim was accessed by the .171 IP address associated with her home and the .41 IP address associated with the Doctor's office that employs Shaba—both of which are discussed above.

91. After submission of her fraudulent application for unemployment insurance benefits, ANASI continued to falsely certify her entitlement to benefits.

92. State of Michigan records indicated that ANASI received over \$26,000 in improper unemployment insurance benefits in 2020.

### **Summary**

93. There were also PPP loan applications for DH, WPC and multiple other business entities associated with ANASI, SHABA, and SAMER involved in this investigation which were submitted to Kabbage which were not approved. It appears that ANASI, SAMER and SHABA applied at multiple lenders for various business entities, seeing which lender would approve a PPP loan. After the group found a lender that would approve their PPP loan, they often submitted multiple other loans

to the same lender using the same and/or slightly altered documents used for the approved loan.

94. Your Affiant has identified a total of 18 different businesses associated with ANASI, SAMER and SHABA that submitted fraudulent PPP loan applications to the SBA. Text messages show ANASI had knowledge and/or was a part of submitting other fraudulent PPP loan applications not addressed in this affidavit. Nine of the businesses linked to these individuals received PPP loans, totaling \$3,384,872.50 in fraudulent PPP loans. A total of \$2,102,065.33 of the PPP loan proceeds have been seized during this investigation. ANASI was involved with the PPP loans explained in this affidavit and many more loans that were not mentioned.

95. It is evident that CPA's MF and CB did not fill out the tax forms that list them as preparer or give anyone consent to use their names on the forms. Based on interviews and a review of electronic evidence, SK and BA did not give ANASI, SHABA or SAMER consent to apply for PPP loans in their names. ANASI, SHABA and SAMER used the identities mentioned in this paragraph as part of a fraudulent scheme to defraud the government without the consent of these individuals.

96. PPP loan applications submitted to Harvest, Celtic, First Home Bank and CRF were submitted electronically through interstate wires. These loan applications were submitted from IP addresses associated with locations in Michigan. These lenders do not appear to have any locations in Michigan; Celtic

(Utah), CRF (Minnesota), First Home Bank (Florida) and Harvest (California and New York). Any communications with lenders and submission of PPP loan paperwork involved interstate wires. Also the wire transfer of funds that funded the PPP loans and ANASI's unemployment assistance involved interstate wires.

### **CONCLUSION**

97. Based on the foregoing, there is probable cause to believe that CHRISTINA ANASI has committed federal crimes, including, but not limited to, violations of the following statutes; 18 U.S.C. § 1343 (Wire Fraud), 18 U.S.C. § 1344 (Bank Fraud); 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud and Bank Fraud); 18 U.S.C. § 1957 (Money Laundering), 18 U.S.C. § 1028A (Aggravated Identity Theft) and 18 U.S.C. § 1014 (False Statements in Connection with a Bank Loan).

### **REQUEST FOR SEALING**

98. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and search warrant. I believe that sealing this document is necessary because the items and information to be seized are relevant to an ongoing investigation into the criminal organization as not all of the targets of this investigation will be searched at this time. Premature disclosure of the contents of

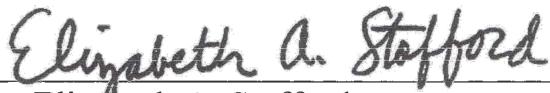
this affidavit and related documents may have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

Respectfully submitted,



Special Agent Brent Nida  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
And/or by reliable electronic means.



Hon. Elizabeth A. Stafford  
United States Magistrate Judge

Dated: May 26, 2023

Dated: May 26, 2023